

# **EXHIBIT “D”**

## Affidavit of Gordon Wilczynski

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

**DAVID R. WILSON and** :  
**CHARLENE WILSON,** :  
:  
**Plaintiffs,** :  
:  
**V.** :  
:  
**TASER INTERNATIONAL, INC.,** :  
:  
**Defendant.** :

---

**AFFIDAVIT OF GORDON WILCZYNSKI**

Personally appeared before me, an officer duly authorized to administer an oath, **GORDON WILCZYNSKI**, who, after being sworn, states the following:

1.

My name is Gordon Wilczynski. I am of age, competent to make this Affidavit, and do so based upon my personal knowledge.

2.

I am a reporter and staff writer for the Macomb Daily newspaper in Mount Clemens, Michigan. In May of 2004, I wrote an article which appeared in the Macomb Daily on June 1, 2004, which concerned a police officer by the name of Ron Lipa, who alleged that he was injured by a TASER during a training exercise

on April 27, 2004. A copy of the article is attached to this Affidavit as Exhibit "A."

3.

When preparing the article in May of 2004, I spoke by telephone to Mr. Steve Tuttle, a spokesman for Taser International in Scottsdale, Arizona. I recall specifically asking Mr. Tuttle whether any law enforcement personnel had ever been injured by a shock from a TASER. Mr. Tuttle told me that no police officer had ever been hurt as a result of the electrical impulses emitted by the TASER. He further told me that there had been 50,000 demonstration exposures and that only two officers had ever been hurt when they hit their heads on the floor.

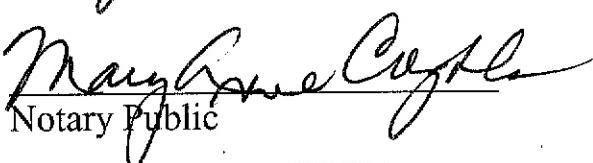
**FURTHER AFFIANT SAITH NOT.**



---

GORDON WILCZYNSKI

Sworn to and Subscribed  
Before Me this 26 day  
Of June, 2007.



MARY ANNE COGHLAN  
Notary Public

MARY ANNE COGHLAN  
State of Michigan  
My Commission Expires 2-27-2014

# Sterling cop claims Taser training injury has kept him out of work

By Gordon Wilczynski  
Macomb Daily Staff Writer

A veteran Sterling Heights police officer has been on sick leave for the past month after claiming he strained his muscles after being zapped during a training exercise by a Taser.

Officer Ron Lipa was knocked to the ground April 27 when he received a shock by a Taser administered by Sterling Heights police Training Officer Mark Oliverio. The Taser is a weapon used to temporarily incapacitate dangerous or high-risk subjects by emitting 50,000 volts. Lipa already has missed work for the past month because of the injury and claims he will be out of work for at least 3 more months.

City officials aren't so sure Lipa hurt himself during the training exercise. Police Chief Barnett Jones said every police department in the country has been training their officers on the Taser the same way.

He said there have been more than 50,000 training shootings with no injuries.

He refused to comment when asked if he

thought Lipa hurt himself some other way.

"When I was Tasered my whole arm was shaking," Lipa said. "I was knocked to the ground."

Lipa said when he got up, he rubbed his elbow. He said when he returned to work the following day, Traffic Lt. Al Byrd sent him to Concentra, the city's clinic on Van Dyke Avenue.

The staff at the clinic gave him a muscle relaxer and told him he had a bruised and swollen arm. They then sent him to therapy. City records indicate that Officers Paul

Reno and Chris Wisniewski also said they suffered minor injuries during the training exercise.

Steve Tuttle, spokesman for Taser in Scottsdale, Ariz., said no police officer has ever been hurt as a result of the electrical impulses emitted by the Taser. He said out of 50,000 demonstration exposures, two officers were hurt, including a police chief from Oregon, when they hit their heads on the floor.

Chief Jones said he plans to continue using the Taser.

Macomb Daily 6/1/04

2007  
6/1/04